

RECEIVED  
SDNY PRO SE OFFICE

UNITED STATES DISTRICT COURT 2017 NOV -7 PM 3:03  
SOUTHERN DISTRICT OF NEW YORK S.D. OF N.Y.

Wilhelmina "Mina" MONTGOMERY

Write the full name of each plaintiff.

17 CV 3489

(Include case number if one has been assigned)

-against-

**AMENDED  
COMPLAINT**

AGNIESZKA HOLLAND

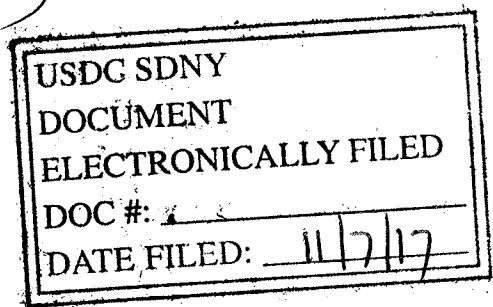
et al

Do you want a jury trial?

☐ Yes ☐ No

(See attached LIST of DEFENDANTS)

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.



#### NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

The PLAINTIFF, Wilhelmina "Mina" MONTGOMERY

- against -

The DEFENDANTS in AMENDED COMPLAINT

① Agnieszka HOLLAND

② Scott ABBOTT

③ James Wong

④ David A. STERN

⑤ Robert Bernacchi (BERNACCHI)

⑥ Cisel y SALDANA

⑦ Mariel SALDANA

⑧ Zoe SALDANA

⑨ Alixandre WITLIN

⑩ Joshua D. MAURER

⑪ Tom PATRICIA

⑫ LIONSGATE ENTERTAINMENT Corporation

⑬ NBC Television

⑭ City ENTERTAINMENT

⑮ Kippster ENTERTAINMENT

⑯ Liaison Films

⑰ Cinestar Pictures

⑱ Federation ENTERTAINMENT

⑲ Netflix ENTERTAINMENT Company

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☐ Diversity of Citizenship

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

*Infringement of Copyright of two of my short stories in the film entitled Rosemary's Baby the /spini-Series.*

### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, \_\_\_\_\_, is a citizen of the State of \_\_\_\_\_  
(Plaintiff's name)

\_\_\_\_\_  
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_

\_\_\_\_\_  
If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, \_\_\_\_\_, is a citizen of the State of \_\_\_\_\_  
(Defendant's name)

\_\_\_\_\_  
or, if not lawfully admitted for permanent residence in the United States, a citizen or  
subject of the foreign state of \_\_\_\_\_

If the defendant is a corporation:

The defendant, \_\_\_\_\_, is incorporated under the laws of  
the State of \_\_\_\_\_

and has its principal place of business in the State of \_\_\_\_\_

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in \_\_\_\_\_

If more than one defendant is named in the complaint, attach additional pages providing  
information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional  
pages if needed.

<u>Wilhelmina</u>	<u>"Mina"</u>	<u>Montgomery</u>	
First Name	Middle Initial	Last Name	
<u>225 Sterling Place</u>		<u>Apt. 6R</u>	
Street Address			
<u>King County, Brooklyn</u>	<u>NY</u>	<u>11238</u>	
County, City	State	Zip Code	
<u>(347) 915-0365</u>	<u>matosimina1@gmail.com</u>		
Telephone Number	Email Address (if available)		

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: Agnieszka HOLLAND  
 First Name Last Name  
Film Director latopro@gmail.com  
 Current Job Title (or other identifying information)  
1933 Selby Ave, L.A., CA 90025; info@unitedtalent.com; (manager,  
 Current Work Address (or other address where defendant may be served)  
Jeff@FieldEntertainment.net Los Angeles CA 90025  
 County, City State Zip Code

Defendant 2: Scott ABBOTT  
 First Name Last Name  
Scriptwriter  
 Current Job Title (or other identifying information)  
906 Doheny Drive  
 Current Work Address (or other address where defendant may be served)  
West Hollywood, CA 90069  
 County, City State Zip Code

Defendant 3: James Wong  
 First Name Last Name  
Scriptwriter  
 Current Job Title (or other identifying information)  
William Morris, 9601 Wilshire Blvd. 8th Floor (literary Agent)  
 Current Work Address (or other address where defendant may be served)  
(310) 285-9000 Beverly Hills CA 90210  
 County, City State Zip Code

(See following attached pages for additional  
 DEFENDANTS) (5 through 19) (listed after 1-4)

Defendant 4:

David A. Stern

First Name

Last Name

Executive Producer, Kippster Entertainment

Current Job Title (or other identifying information)

345 Seventh Avenue Suite 503

Current Work Address (or other address where defendant may be served)

New York NY 10001

County, City

State

Zip Code

## III. STATEMENT OF CLAIM

Place(s) of occurrence:

Los Angeles, CA; New York, NY; Paris, France

Date(s) of occurrence:

Shown on NBC Television on May 11, 2014 and May 16, 2014

## FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed. **THE DEFENDANTS,**

Director Agnieszka HOLLAND; Scriptwriters Scott ABBOTT and James Wong; producers David A. Stern, et al produced the film "ROSEMARY'S Baby the Mini-Series", after the PLAINTIFF e-mailed her TWO SHORT STORIES, "The Groaning Road the TRUE STORY" and "The Groaning Road the FICTIONALIZED STORY" to Director HOLLAND, who favorably and enthusiastically critiqued the said TWO STORIES in her e-mail reply. Each DEFENDANT earned and is earning income from the televised airing of the FILM, from DVD sales of the FILM, from Internet Streaming of the FILM, from on-demand distribution ALL OVER THE WORLD. The PLAINTIFF never gave permission for the use of her TWO SHORT STORIES USED for the Production of the said FILM, and has not received any remuneration from this production, which is largely based on the PLAINTIFF'S TWO SHORT STORIES.

Many of the characters, the setting, the story-line, the time line, exact dates, verbatim dialogue and dialogue developed by the PLAINTIFF in descriptions in "The Crooning Road The TRUE STORY" and "The Crooning Road The FICTIONALIZED STORY" inspired the characters, setting, storyline, time-line, dates, verbatim dialogue and inspired dialogue in "ROSEMARY'S BABY the Mini-Series."

The FACT is that so many resemblances could not be coincidences after HOLLAND'S enthusiastic email to the PLAINTIFF.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

(SEE ATTACHED LISTS of RESEMBLANCES after Foreword)

#### IV. RELIEF

State briefly what money damages or other relief you want the court to order.

The Plaintiff want the Court to order \$10,000,000 in damages for "The Crooning Road The TRUE STORY" and \$10,000,000 for The Crooning Road The FICTIONALIZED STORY. The PLAINTIFF wants the Court to order \$20,000,000 in damages in total.

1) Director - Agnieszka Holland

DOB: 11/28/1948 (68)

Current Address:

1933 Selby Ave  
Los Angeles, CA 90025

E-mail: Latopro@gmail.com

Previous Addresses:

513 Arden Blvd  
Los Angeles, CA 90004

11051 Strathmore Dr  
Los Angeles, CA 90024

(310) 208-5250  
(323) 935-7535

**TALENT AGENT**

United Talent Agency (UTA) ✓

Representatives:

Leslie Schuster  
Michael Sheresky  
Ramses Ishak

<http://www.unitedtalent.com>

[info@unitedtalent.com](mailto:info@unitedtalent.com) ✓

(310) 273-6700 phone ✓  
(310) 247-1111 fax

UTA Plaza  
9336 Civic Center Drive  
Beverly Hills, CA 90210

**MANAGER**

Field Entertainment

Representatives:

Jeff Field

[jeff@fieldentertainment.net](mailto:jeff@fieldentertainment.net)

(310) 271-8440 phone  
(310) 271-6243 fax

1240 N Wetherly Dr  
Los Angeles, CA 90069



**(Agnieszka Holland Continued)**

**LEGAL REPRESENTATIVE**

Hirsch Wallerstein Hayum Matlof and Fishman

Representatives:

George T Hayum  
(310) 703-1777 phone  
ghayum@hwhmf.com

<http://www.hwhmf.com/>

(310) 703-1700 phone  
(310) 703-1799 fax

contact@hwhmf.com

10100 Santa Monica Blvd  
Ste 1700  
Los Angeles, CA 90067

**2) Screenwriter - Scott Abbott**

DOB: 08/30/1962 (55)

Current Address:

906 Doheny Dr  
West Hollywood, CA 90069

Previous Addresses:

1400 Kelton Ave  
Los Angeles, CA 9002

10964 Wellworth Ave  
Los Angeles, CA 90024

(310) 408-6580  
(310) 268-1247  
(310) 445-1913  
(213) 268-1247  
(213) 662-2164  
(310) 408-0322

**TALENT AGENT LITERARY**

Paradigm Talent Agency

Representatives:

Bill Douglass

<http://www.paradigmagency.com>

**(Scott Abbott Continued)**

(310) 288-8000 phone  
(310) 288-2000 fax

360 N Crescent Dr  
North Bldg  
Beverly Hills, CA 90210

**LEGAL REPRESENTATIVE**

Ziffren Brittenham

Representatives:

Melanie Cook

<http://ziffrenlaw.com>

(310) 552-3388 phone  
(310) 553-7068 fax

1801 Century Park W  
Los Angeles, CA 90067

**3) Script Writer - James Wong**

DOB: 04/20/1959 (58)

**TALENT AGENT**

William Morris Endeavor (WME) Entertainment

Representatives:

Adriana Alberghetti  
David Stone

<http://www.wmeentertainment.com>

(310) 285-9000 phone  
(310) 859-4462 fax

9601 Wilshire Blvd  
8th Fl  
Beverly Hills, CA 90210

**LEGAL REPRESENTATIVE**

Nelson Davis

Representative:

Peter Nelson

<http://www.nelsondavislaw.com/>

**(James Wong Continued)**

(424) 214-4800 phone  
(424) 214-4810 fax

233 Wilshire Blvd  
Ste 900  
Santa Monica, CA 90401

**4) Executive Producer - David A. Stern**

**COMPANY**

KippSter Entertainment  
Partner, Producer

917-923-5033 phone

345 Seventh Avenue  
Suite 503  
New York, NY 10001

**COMPANY**

Sleeping Giant Films  
Co-President of Development & Production, Producer

<http://www.sgfilms.net>

424-281-0930 phone  
917-273-0670 alt. phone

2121 Avenue Of The Stars  
Suite 2300  
Los Angeles, CA 90067

**LEGAL REPRESENTATIVE**

Katz Golden Rosenman

<http://www.kgrllp.com/>  
(310) 998-9200 phone  
(310) 998-9177 fax  
2001 Wilshire Blvd  
Ste 400  
Santa Monica, CA 90403

**5) Producer - Robert Bernacchi**

DOB: 04/20/1963 (54)

Current Address:

1028 18th St  
Santa Monica, CA 90403

Previous Addresses:

2214 Euclid St  
Santa Monica, CA 90405

2543 Francisco Ave  
Chicago, IL 60647

**TALENT AGENT**

United Talent Agency (UTA)

Representatives:

Craig Bernstein

<http://www.unitedtalent.com>  
[info@unitedtalent.com](mailto:info@unitedtalent.com)

(310) 273-6700 phone  
(310) 247-1111 fax

UTA Plaza  
9336 Civic Center Drive  
Beverly Hills, CA 90210

**6) Producer - Alixandre Witlin / Alexandra Witlin (Spouse of Joshua D. Maurer)**

DOB: 09/22/1964 (53)

Current Address:

266 Rexford Dr  
Beverly Hills, CA 90212

or 266 1/2 Rexford Dr.  
Beverly Hills, CA 90212

Previous Address:

1360 Roxbury Dr  
Los Angeles, CA 90035

(310) 273-3101  
(310) 284-7925  
(310) 985-3102

**COMPANY**

City Entertainment  
President/Executive Producer (Executive)

**(Alixandre Witlin/ Alexandra Witlin Continued)**

(310) 273-3101 phone  
(310) 273-3676 fax

266½ Rexford Dr  
Beverly Hills, CA 9021

**7) Producer - Joshua D. Maurer (Spouse of Alixandre Witlin)**

DOB: 02/26/1964 (53)

310-248-2000 phone

Current Address:

266 Rexford Dr  
Beverly Hills, CA 90212

Previous Address:

9461 Charleville Blvd  
Beverly Hills, CA 90212

**COMPANY**

City Entertainment  
President/Executive Producer (Executive)

(310) 273-3101 phone  
(310) 273-3676 fax

266½ Rexford Dr  
Beverly Hills, CA 90212

**LEGAL REPRESENTATIVE**

Frank Stewart

310-275-7560 phone  
310-275-7561 fax

280 S. Beverly Dr  
Suite 205  
Beverly Hills, CA 90212

**8) Producer - Cisely Saldana/ Cicely Saldana**

Current Address:

11035 Otsego St  
North Hollywood, CA 91601

**(Cisely Saldana/ Cicely Saldana Continued)**

Previous Addresses:

550 Santa Anita Ave  
Burbank, CA 91501

8721 Santa Monica Blvd  
Los Angeles, CA 90069

(718) 478-7049

**COMPANY**

Cinestar Pictures  
CEO (Executive)

info@cinestarpics.com

**LEGAL REPRESENTATIVE**

Gray Krauss Sandler Des Rochers

Representative:

André Des Rochers

adesrochers@gkssd.com

(212) 966-6700 phone  
(212) 966-6051 fax

207 West 25th Street  
Suite 600  
New York, NY 10001

<http://www.gkssd.com>

(310) 929-6590 phone

contact@gkssd.com

Los Angeles, California

**9) ~~Producer - Mariel Saldana~~**

Current Address:

10821 Blix St  
North Hollywood, CA 91602

Previous Addresses:

11049 Magnolia Blvd  
N Hollywood, CA 91601

550 Santa Anita Ave  
Burbank, CA 91501

(818) 433-7370

**COMPANY**

Cinestar Pictures  
Producer

✕ **10) Producer - Zoe Saldana**

DOB 06/19/1978 (39)

Current Address:

11818 Union Tpke  
Kew Gardens, NY 11415

Previous Addresses:

16030 Ventura Blvd  
Encino, CA 91436

**COMPANY**

Cinestar Pictures  
Principal (Producer)

<http://www.zoesaldana.com/>

**COMPANY**

Saldana Productions  
Principal (Producer)

**TALENT AGENT**  
Creative Artists Agency (CAA)

Representatives:

Alexandra Trustman

Jim Toth

[jtoth@caa.com](mailto:jtoth@caa.com)

<http://www.caa.com>

[info@caa.com](mailto:info@caa.com)

✕ (424) 288-2000 phone  
(424) 288-2900 fax

2000 Avenue of the Stars  
Los Angeles, CA 90067

**MANAGER**  
**LBI Entertainment**

Representatives:

Amy Kawa  
(310) 775-8610 phone

Rick Yorn

(310) 775-8600 phone

2000 Avenue of the Stars  
3rd Floor, North Tower  
Century City, CA 90067

**TALENT AGENT COMMERCIAL**

**Bailey Brand Management**

Representatives:

Troy Bailey

[troy@bbm.la](mailto:troy@bbm.la)

(310) 899-0200 phone

312 Arizona Ave.  
#314  
Santa Monica, CA 90401

**TALENT AGENT LITERARY**

**Creative Artists Agency (CAA)**

Representatives

Ida Ziniti

<http://www.caa.com>

[info@caa.com](mailto:info@caa.com)

(424) 288-2000 phone  
(424) 288-2900 fax

2000 Avenue of the Stars  
Los Angeles, CA 90067



**PUBLICIST**

Baker Winokur Ryder Public Relations (BWR)

Representatives:

Gary Mantoosh

310 248-6156 phone

[gary.mantoosh@bwr-pr.com](mailto:gary.mantoosh@bwr-pr.com)

<http://www.bwr-pr.com/>

(310) 550 7776 phone

(310) 550 1701 fax

[info@bwr-pr.com](mailto:info@bwr-pr.com)

9100 Wilshire Boulevard

Ste 500 West Tower

Beverly Hills, CA 90212

**LEGAL REPRESENTATIVE**

Morris Yorn Barnes Levine Krintzman Rubenstein Kohner & Gellman

Representatives:

David Krintzman

[dk@morrisyorn.com](mailto:dk@morrisyorn.com)

Kevin Yorn

[ky@morrisyorn.com](mailto:ky@morrisyorn.com)

(310) 319-3900 phone

(310) 319-3999 fax

2000 Avenue Of The Stars

3rd Floor, North Tower

Los Angeles, CA 90067

**11) Producer - Tom Patricia**

**COMPANY**

✱ Sonar Entertainment

✱ 424-230-7140 phone

212-977-3917 fax

2121 Avenue of the Stars

Los Angeles, California 90067

**COMPANY**

*-continued next page*

✧ RHI Entertainment Inc.

✧ (212) 977-9001 phone

423 W 55th St  
New York, NY 10019

**COMPANY**

✧ RHI Entertainment Distribution LLC

✧ (212) 261-9100 phone

1325 Ave of The Americas (6th Ave)  
# 21  
New York, NY 10019

- ⑫ LionsGATE Entertainment, 75 Rockefeller Plaza #1600  
New York, NY 10019 / 2700 Colorado Ave, # 200, ~~SEA~~  
Santa Monica, CA 90404
- ⑬ NBC Television, 30 Rockefeller Plaza, New York, NY 10112
- ⑭ City Entertainment, 266 1/2 Rexford Dr., Beverly Hills, CA  
90212
- ⑮ Kippster Entertainment, David A. Stern, CEO, 345 Seventh Ave.  
New York, NY 10001 # 503
- ⑯ Liaison Films, 144 Rue des Acacias, Paris FRANCE 70517
- ⑰ CineStar Pictures info@cinestarpics.com  
16030 Ventura Blvd., Encino, CA 91436  
17530 Ventura Blvd., Encino, CA 91316
- ⑱ Federation Entertainment info@federationentertainment.com  
info@Fedent.com  
315 Main Street, #450, Santa Monica, CA 90405 (310) 399-5030
- ⑲ NetFlix Corporation, Reed Hastings, CEO, chairman,  
President  
100 Winchester Circle  
Los Gatos, CA 95032  
(408) 540-3700

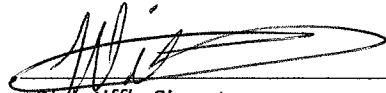
**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

11-07-2017  
Dated

  
Plaintiff's Signature

Wilhelmina "Mina"  
First Name Middle Initial

MONTGOMERY  
Last Name

c/o MCINTYRE, 225 Sterling Place Apt. 6R  
Street Address

King, Brooklyn  
County, City

NY  
State

11238  
Zip Code

(347) 915-0365  
Telephone Number

matosimina1@gmail.com  
Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

Congratulations

Wilhelmina Montgomery <wmtext@gmail.com>

05/02/2012

À latopro

Hello Agnieszka,

How are you and Kasia?

It's been a long time since the two of you studied English with me in Paris -- when I myself learned so much -- but since then many of your brilliant films have further enlightened and given me cause for serious reflection. I remember some of the scenes as if I saw them yesterday.

I'm now teaching at Sciences Po, but also privately; Irena is still referring me to her friends and their children.

She gave me your e-mail address last week, as I wanted to discuss with you a disturbing true story that involved a Nazi couple whom I met with a friend in their apartment here in 1988. What happened after that meeting haunts me today even though I blocked it out for more than a decade after that night. When I tell the story it leaves people speechless.

If I were to turn it into fiction, my subsequent search would lead me straight to a reactionary, international Amercian church here in Paris; which seems to have welcomed some questionable characters during and after World War II.

Then last night I watched a fascinating YouTube video of you being interviewed about "In Darkness" and your life's work, where you say you'd rather not do anymore English language films. Nonetheless, as I had already planned to query you about this strange meeting and its after-shock, I would still appreciate your opinion of them.

Irena told me how busy you are these days, which is probably always the case, but whenever you could spare an hour I would be pleased to come to Prague to meet with you.

Please know that I am open to your suggestions and look forward to hearing from you.

Congratulations on being nominated for an Academy Award this year; I look forward to seeing "In Darkness".

Yours sincerely,

Aminah Montgomery

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Dear Aminah! Thanks for your letter; no, I will be still considering English speaking projects; I just didn't want to do Eastern European story in this language. In Prague I will be rather busy, has long and busy shooting schedule. But I certainly will come to Paris by the end of May and we can meet. You can also send me the story if you written it already. All my best and hope to see you in few months. Agnieszka  
Sent via BlackBerry from T-Mobile

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----- Forwarded message -----

From: Wilhelmina Montgomery <wmtext@gmail.com>

Date: 2012-02-20 12:52 GMT+01:00

Subject: Monday at last

To: latopro@gmail.com

Dear Agnieszka,

How are you and how is your your latest project coming along? On schedule I hope.

I have never missed a deadline my life, and certainly not a self-imposed one! But I miscalculated the time I needed for my school work, and then instead of writing a short synopsis of the the true story and the fictionalized one, I sat down and began to write the stories themselves-- ending up with 11 and 17 pages respectively, and exactly one week late.

Read them whenever you have the time. My cousin's sending copies to his friend Oprah, and I'll keep writing and editing.

I'll be rooting for you to win next Sunday at the Oscars, and am very proud of you.

Best regards,

Aminah

**2 pièces jointes**

**Prévisualiser la pièce jointe The Groaning Road - The True Story.docx**

**Word**

**The Groaning Road - The True Story.docx**

**Prévisualiser la pièce jointe The Groaning Road - The Fictionalized Story.docx**

**Word**

**The Groaning Road - The Fictionalized Story.docx**

Cliquez ici pour Répondre ou pour Transférer le message.

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July 11, 2012

Dear Aminah! I am really sorry I didn't write you sooner; was way to busy with my shooting, then travels around the world, editing etc to focus properly on your stories. I read them now with the real pleasure and interest. It is well written, with the personal voice and vivid, sensual characterization. The story about G and Hitler's portrait is strong and subtle "short story" in the best American literature way, the second one seems to me to be one chapter of the longer novel, it is intriguing, but doesn't work like the independent short story, rather as a fragment of the bigger one. I don't know what were your intentions and neither what plans do you have with this writing. Anyway, I

feel the vibrant tone and your - so original - point of view and will be curious to read and know more of your work. All my best - Agnieszka  
Sent from my BlackBerry wireless handheld.

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Dear Agnieszka,

Thank you for taking the time out of your busy schedule to read the writings I sent you. If you only knew how much I appreciate your observations. It's true that one of the stories was only a beginning of a longer one on which I've continued to work; and finding G. at the end of that fictional hunt makes for suspenseful drama I believe.

If I may, I'll send you a couple other short stories by the end of August that you can also read whenever you can spare the time. I know how demanding your projects are, and you've already inspired me to just keep writing.

A collection of short stories might be just the thing. Then if I ever get a nod from one of the producers I've queried, we'll see what we can do with one of them.

I wish you all the best for the new film. And for now, rest as much as possible and enjoy the summer.

Sincerely,

Aminah

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----- Forwarded message -----

From: agnieszka holland <latopro@gmail.com>

Date: 2014-01-07 17:41 GMT+01:00

Subject: From Agnieszka

To: "wmtext@gmail.com" <wmtext@gmail.com>

Happy New Year, Mina! I wonder how are you? Did you succeeded with your writing projects? I am in Paris now for a bit longer, starting the mini series for NBC based on Rosemary's baby and wondering if you're interested 1) to try to play the small part in that?

2) to give some lessons to the children of my US producers? Let me know! Hugs. Agnieszka Holland

Sent from my iPad

---

----- Forwarded message -----

From: Wilhelmina Montgomery <wmtext@gmail.com>

Date: 2014-01-07 18:40 GMT+01:00

Subject: Re: From Agnieszka

To: agnieszka holland <latopro@gmail.com>

Happy New Year, Agnieszka ! How wonderful to hear from you.

Haven't found our producer yet, but haven't given up. I would love to play any part in the mini series and give lessons to your producer's children as well. How old are they?

What's the part and how should I dress for the casting? How many pounds do I have to lose before tomorrow morning ? :) This is exciting.

See you soon I hope.

Big kiss,

Mina

06 10 96 2009

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2014/1/7 <latopro@gmail.com>

It will be nothing big, don't worry. Casting people will contact you in few days. Hugs - Agnieszka

Sent from my iPhone



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Hi Agnieszka,

I'm sure you're very busy. But please know that even though I didn't get the small role I thank you for thinking about me. I was, however, asked to work as an extra and perhaps will see you then. And if your producers still need someone to teach their children they can count on me to do an excellent job.

Much success with the film,

Mina

---

It will be an interesting scene I hope and we'll have fun together. The producers didn't work their plans through yet, so I don't know where they exactly are with the kid's occupation. But thank you a lot for all your openness! Best - Agnieszka.  
Sent via BlackBerry from T-Mobile

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Wilhelmina Montgomery <wmtext@gmail.com>  
07/01/2014

À agnieszka  
O.K.

**FOREWORD to the LIST of RESEMBLANCES  
of ROSEMARY'S BABY The Mini-series to The Groaning Road  
The TRUE STORY**

**To the PLAINTIFF**, watching ROSEMARY'S BABY The Mini-Series and realizing how the DEFENDANTS mined BOTH of her SHORT STORIES, "The Groaning Road A TRUE STORY" and "The Groaning Road The FICTIONALIZED STORY, for this one film, feels like being gang-raped by a group of wealthy, arrogant, entitled men and women who are threatening murder.

**To the PLAINTIFF, watching** ROSEMARY'S BABY The Mini-Series while re-reading her creations "The Groaning Road The TRUE STORY" and "The Groaning Road The FICTIONALIZED STORY" feels like watching your children being gang-raped by a group of wealthy, arrogant, entitled men and women who are threatening murder.

For, not knowing who initiated them, **the PLAINTIFF has received death threats.** One of these death threats said, **"If you step one foot in this country, your life will be in danger."** Another one said, **"Anywhere you go we will find you."** And yet another one said, **"Just how much is a life worth today?"**

The PLAINTIFF's computer and three of her e-mail accounts have been hacked. The PLAINTIFF was **told by Yahoo! technicians that the reason she could not access her Yahoo! Account is because "it is being controlled from two different locations."** Revisions of "The Groaning Road The TRUE STORY" and "The Groaning Road The FICTIONALIZED STORY" – revisions that are not listed in this complaint, and that PLAINTIFF never let anyone read – **were mysteriously deleted from the PLAINTIFF's computer.** The PLAINTIFF would like to know how **descriptions and dialogue from these single revisions of the two said SHORT STORIES, that she never shared with anyone, ended up in ROSEMARY'S BABY the Mini-Series.**

HOLLAND, the director of ROSEMARY'S BABY The Mini-Series, has stated that women should "stand up for themselves".

Standing up for herself is what the PLAINTIFF is doing in this COMPLAINT.

**A Five-Page Preface  
to the  
LIST OF RESEMBLANCES Found in ROSEMARY'S BABY the Mini-Series  
to  
"The Groaning Road A TRUE STORY" :**

**(If it pleases the Court, a separate LIST OF RESEMBLANCES that are found in) the film "ROSEMARY'S BABY the Mini-Series" to the PLAINTIFF'S SHORT STORY entitled "The Groaning Road The FICTIONDALIZED STORY" is also being submitted as part of her Complaint against the DEFENDANTS).**

**Agnieszka HOLLAND, the director of ROSEMARY'S BABY the Mini-Series, stated in an interview with Radio Praha in January 2013 concerning another of her films, and nearly one year after she e-mailed the PLAINTIFF to congratulate her for "The Groaning Road A TRUE STORY" and "The Groaning Road The FICTIO-NALIZED STORY" :**

**"There's some amount of fiction here. We decided to mix fiction with the real story. But it was fictionalized.**

**Half of the characters are real and half are compilations of characters."**

**HOLLAND wrote in one of her several e-mails to the PLAINTIFF of the "real pleasure and interest" she felt while reading the PLAINTIFF'S TWO SHORT STORIES. Moreover, in that same e-mail HOLLAND also wrote that she found the PLAINTIFF'S characters in these TWO STORIES to be "vivid" and "sensual".**

Dear Aminah! I am really sorry I didn't write you sooner;  
was way to busy with my shooting, then travels around the world,  
editing etc to focus properly on your stories. I read them now  
with the real pleasure and interest. It is well written, with  
the personal voice and vivid, sensual characterization. The  
story about G and Hitler's portrait is strong and subtle "short

story” in the best American literature way, the second one seems to me to be one chapter of the longer novel, it is intriguing, but doesn’t work like the independent short story, rather as a fragment of the bigger one. I don’t know what were your intentions and neither what plans do you have with this writing. Anyway, I feel the vibrant tone and your - so original - point of view and will be curious to read and know more of your work. All my best - Agnieszka  
Sent from my BlackBerry wireless handheld. (Emphasis that of the PLAINTIFF)

(See HOLLAND’s E-mails of July, 2012 and January, 2014)

In the LIST OF RESEMBLANCES that follows this Preface, the PLAINTIFF intends to demonstrate to the Court and to the women and men of the jury that *the several dozens of very close and flagrant resemblances that are found in the film “ROSEMARY’S BABY the Mini-Series” to her SHORT STORY entitled “The Groaning Road A TRUE STORY” could not possibly be coincidences.*

The nearly seventy-five (75) resemblances found in ROSEMARY’S BABY the Mini-Series to *EACH* of the PLAINTIFF’s TWO SHORT STORIES include those to several characters, the setting, the storyline, the timeline, descriptions of scenes, adapted dialogue within similar scenes, *verbatim* dialogue within similar scenes, verbatim dialogue that is spoken by similar characters in similar scenes and circumstances, and exact dates.

Agnieszka HOLLAND, director of ROSEMARY’S BABY the Mini-Series, not only read, but enthusiastically critiqued in one of several e-mails BOTH OF THE PLAINTIFF’s SHORT STORIES concerned in this Complaint (See the list of e-mails that that were exchanged by HOLLAND and the PLAINTIFF). In that particular e-mail HOLLAND wrote of the PLAINTIFF’s “vivid”, “sensual” characters; and of the “real pleasure” she felt while reading the TWO SHORT STORIES, which she deemed to be “intriguing” and “in the tradition of the best American short stories”.

The PLAINTIFF asks, then, how THE TWO SCREENWRITERS of ROSEMARY'S BABY the Mini-Series could have reproduced in one film many more than *one hundred* resemblances to these same TWO SHORT STORIES without having had access to them.

It is a given that *any one* of these close resemblances found in ROSEMARY'S BABY the Mini-Series to "The Groaning Road A TRUE STORY" and to "The Groaning Road The FICTIONALIZED STORY" could not stand alone as proof of infringement. However, the PLAINTIFF humbly asks the Court and the jury to read BOTH LISTS OF RESEMBLANCES, to read BOTH SHORT STORIES that the PLAINTIFF e-mailed to HOLLAND on January 20 of 2012 and to watch the FILM "ROSEMARY'S BABY the Mini- Series" — to read, to listen to and to look at the evidence within the whole story; and then to consider the astounding number of RESEMBLANCES that are found in the FILM to the PLAINTIFF's TWO SHORT STORIES.

Thus, in addition to LIST OF RESEMBLANCES that are found in "ROSEMARY'S BABY the Mini-Series" to the PLAINTIFF's "The Groaning Road The FICTIONALIZED STORY", we submit this LIST OF RESEMBLANCES that are found in that same FILM to "The Groaning Road A TRUE STORY".

As will be shown in detail in the LIST that follows this PREFACE, these resemblances more specifically include, but are not limited to :

(1) Storyline, (2) an interracial couple *just recently arrived* (2) in Paris, of which (3) a writer (like the PLAINTIFF), who is also (4) a Professor of English (like the PLAINTIFF) at a (5) university in Paris (like the PLAINTIFF); (6) a now African-American "Rosemary Woodhouse" who is obsessed with a disappearance from an apartment in Paris, (7) a now African-American "Rosemary" actively investigating that person's disappearance from a building in Paris, (just as the PLAINTIFF actively investigates the disappearance of someone from a building in Paris in "The Groaning Road The TRUE STORY), (8) "Rosemary's" obsession, throughout the said FILM, with a photo that she has found in that

apartment in Paris (like the PLAINTIFF's obsession with a Photo of Hitler that she has seen in an apartment in Paris in "A TRUE STORY"), (9) dialogue that was inspired by and developed from the PLAINTIFF's writing in "The Groaning Road A TRUE STORY, similar characters, scenes and setting to characters, scenes and setting described by the PLAINTIFF in "The Groaning Road A TRUE STORY";

It is not credible that so many RESEMBLANCES in one film, ROSEMARY'S BABY The Mini-Series, to TWO SHORT STORIES that were written by the PLAINTIFF, and that were enthusiastically critiqued in an e-mail addressed to the PLAINTIFF by HOLLAND, the director of ROSEMARY'S BABY the Mini-Series, would be coincidences. Again, the FILM's director Agnieszka HOLLAND congratulated the PLAINTIFF in writing for these TWO SHORT STORIES two years before the film was produced and shown on NBC Television.

The scriptwriters of ROSEMARY's BABY the Mini-Series also obviously read, dissected, mined and infringed *BOTH* of the PLAINTIFF's SHORT STORIES, "The Groaning Road A TRUE STORY" and "The Groaning Road The FICTIONALIZED STORY for the said FILM.

Moreover, not only did the DEFENDANTS infringe and adapt BOTH OF the PLAINTIFF's SHORT STORIES to ROSEMARY'S BABY the Mini-Series, along with BOTH OF THE PLAINTIFF's professions (writer and professor of English at University in Paris), but they also adapted the PLAINTIFF's name, which is "Mina", to the FILM's character "Nina" (who either "jumps" or is pushed from the window of her apartment in Paris).

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"There's some amount of fiction here. We decided to mix fiction with the real story. But it was fictionalized.  
Half of the characters are real and half are

**compilations of characters.”**

— Agnieszka **HOLLAND**, director of ROSEMARY’S BABY the Mini-Series, in an **interview with Radio Praha in January, 2013** concerning another of her films, **and nearly one year after she e-mailed the PLAINTIFF** to congratulate her for “The Groaning Road The TRUE STORY” and “The Groaning Road The FICTIONALIZED STORY” (All emphasis is that of the PLAINTIFF).

**RESEMBLANCES IN ROSEMARY’S BABY THE MINI-SERIES  
TO “THE GROANING ROAD A TRUE STORY”**

The above title, “The Groaning Road A TRUE STORY”, is one of two short stories that were e-mailed to HOLLAND on the same day by the PLAINTIFF, **February 20, 2012**. The other short story that was e-mailed to HOLLAND is entitled “The Groaning Road the FICTIONALIZED STORY, of which the resemblances are **numbered in a separate list**). HOLLAND enthusiastically critiqued both of these said SHORT STORIES by e-mail.

1) Night 1, minute 57 of ROSEMARY’S BABY the Mini-Series :

The Pries, **Father Tekem**, shows “Rosemary” a typed page entitled STEVEN MARCATO, and subtitled TRUTHS AND MYTHS, which is a “compilation” adapted from the PLAINTIFF’s TWO subtitles “THE TRUE STORY” and “The FICTIONALIZED STORY” ).

(Because the THREE COLUMNS OF **BLURRED LINES** on that typed page resemble the long-paragraph style of the PLAINTIFF, IT WOULD BE INTERESTING TO FIND OUT WHAT THE TYPED WORDS ON THE PAGE



SAY IN THIS FRAME IN THE FILM). (See DVD, as streaming versions of ROSEMARY'S BABY the Mini-Series have been edited).

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In "The Groaning Road A TRUE STORY", the PLAINTIFF writes of being haunted by the disappearance of a friend in Paris, by a photo of Hitler in a Paris apartment and by being obsessed with the identity of a strange couple in that apartment.

For the procedure of "mixing" and "compiling" fictional characters with "real people" as Ms. HOLLAND stated in an interview, not only were PLAINTIFF's *name and career* as a writer and professor of English at a university in Paris adapted to the "re-imagined" remake of "ROSEMARY'S BABY the Mini-Series".

In addition, this **painful event in the PLAINTIFF's life that the PLAINTIFF wrote about in "The Groaning Road A TRUE STORY"** inspired the 1) characters, 2) setting, 3) plot, 4) storyline, 5) timeline, 6) pertinent dates, 7) scenes, 8) verbatim dialogue, 9) verbatim dialogue *within* similar scenes, 10) , paraphrased dialogue, and a word or two added to verbatim dialogue— all as seen and heard in ROSEMARY's BABY the Mini-Series,

**Including :**

- characters, setting, scenes and dialogue that were inspired by and developed from **the PLAINTIFF's descriptions of the walks of two friends (one of them the PLAINTIFF herself) through Paris' wealthy- as well as through its popular neighborhoods,**
- characters, setting, scenes and dialogue that were inspired by and developed from **the PLAINTIFF's detailed writing concerning time and Paris' bridges ;**
- characters, setting, scenes and dialogue that were inspired by and developed from the **PLAINTIFF's description of a nightclub scene in Paris;**
- characters, setting, scenes and dialogue that were developed from the **PLAINTIFF's description of the PLAINTIFF's exotic house parties in Paris;**
- characters, setting, scenes and dialogue that were developed from the



**PLAINTIFF's cynical writing on the Church;**

- **storyline**, characters, setting, scenes, and dialogue that were developed from the **PLAINTIFF's descriptions of a disturbing photo of Hitler** that the PLAINTIFF had seen in a Paris apartment;
  - **storyline**, characters, setting, scenes and dialogue — including verbatim dialogue — that were developed from the **PLAINTIFF's description of a strange couple in the above-mentioned apartment in Paris;**
  - **storyline**, scenes, characters and dialogue — including verbatim dialogue — that were based on and developed from descriptions of the PLAINTIFF's return to the several times scene to investigate the disappearance of a friend, which the PLAINTIFF wrote about in **"The Groaning Road A TRUE STORY"**.
- 

"Fear is Born" :

**Page 9, paragraph 4, line 3** of "The Groaning Road A TRUE STORY" :

Struck with fear and paranoia, I decided that audible questions would have to wait as the two gray mice would surely be listening at the door.

2) The subtitle of ROSEMARY'S BABY the Mini-Series is "Fear is born"

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**The Spacious Gray Apartment :**

**Page 8, paragraph 5, line 6** of "The Groaning Road A True Story" :

I showed up the next evening on time, forgetting the fifteen

minutes of grace, climbed the two flights of stairs and rang the bell expectantly. Almost immediately the door swung open and he stood there beaming. He kissed me on both cheeks French style and ushered me into a spacious living room with high ceilings and plush gray carpets. A small light fixture fit snugly against the ceiling. Like the carpet, the two pieces of furniture in the room were upholstered in a soft, thick, gray fabric. A big, comfortable gray sofa placed close to the opposite wall faced the door, and a matching gray armchair sat to the right of it. There was no other furniture in the immense room – no end tables, no coffee table, no lamps, no bookshelves, nothing else – except for one other object: on the wall above the sofa a photo of Hitler, black and white though it was, obliterated every trace of the gray carpet, sofa and armchair; then, due to the emptiness of the room, the portrait headshot multiplied itself exponentially.

**Page 11, last paragraph, line 5** of “The Groaning Road A TRUE STORY” :

**Since that night** more than twenty years ago *in the gray apartment* with a photo of Hitler on the wall, I’ve not heard his voice nor seen him again. :

**3) Night 1, minute 0:26:45** of ROSEMARY’S BABY the Mini-Series :

In this scene in the FILM, after accepting the Castevets’ offer for the Woodhouses move into an apartment that the Castevets own, Rosemary arrives with her luggage and enters a spacious apartment with high ceilings and gray walls; *it is furnished with a gray rug, gray curtains, and a plush gray sofa* .

In this frame of the scene in the FILM, the walls are bare — except for one painting, the image of which is not clearly shown. In the next frame of this scene, we see Rosemary as she dives airplane-style into *a plush gray bed*. ***In this frame of the scene, that of the bedroom, we again see gray curtains and bare gray walls.*** ***Thus, the entire apartment is depicted in the FILM as gray.***

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**The Mysterious Couple :**

**Page 9, paragraph, 4, line 2** of “The Groaning Road A TRUE STORY”:

I hadn’t heard them enter the room, but they must have  
heard the doorbell. **There behind me stood a couple,**  
**who more than anything looked like two little gray**  
**mice – and had proved to be just as quiet,**

**Page 10, paragraph 2, line 6** of “ The Groaning Road A TRUE STORY” :

— and maybe like he probably did, I wanted to know more  
about these Nazis living in the middle of Paris in 1988,

**Night 1, minute 0:45:30** of “ROSEMARY’S BABY” the Mini-Series :

**Paris Police Commissioner:** I don’t understand. **Do you know them?**  
**Are they missing?**

**Rosemary:** No, I don’t know anything about them.

**Paris Police Commissioner:** But you have suspicions they were  
met with foul play?

**Rosemary:** Yes ... look (showing him **the photo**), that’s in our apartment ...

4) **Paris Police Commissioner:** You have an entire life that you imagined  
for them from this single snapshot.

**Rosemary:** Yes. It’s a little crazy, right? I’m really sorry I...

5) **Paris Police Commissioner:** Have you talked to Mrs. Castevet? **She might know the whereabouts of this strange, mysterious couple.**

Night 1, minute 55:25 of “ROSEMARY’S BABY” the Mini-Series :

**Father Tekem :** Are you a friend of **Nina’s?**

6) **Rosemary :** No, but I want to know more about her.

**Father Tekem :** She died.

**Rosemary :** Three months ago.

...

7) **Rosemary :** Father, I’m trying to find out why.

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The Ubiquitous, Omnipresent Photo in ROSEMARY’S BABY the Mini-Series :

Page 8, paragraph 5, line 7 of “The Groaning Road A TRUE STORY” :

**There was no other furniture in the immense room – no end tables, no coffee table, no lamps, no bookshelves, nothing else – except for one other object: on the wall above the sofa a photo of Hitler, black and white though it was, obliterated every trace of the gray carpet, sofa and armchair; then, due to the emptiness of the room, the portrait headshot multiplied itself exponentially.**

**Page 9, paragraph 4, line 1 :**

Suddenly I felt another presence in the room and turned around quickly, my arms still raised and my mouth still open. I hadn't heard them enter the room, but they must have heard the doorbell. There behind me stood a couple, who more than anything looked like two little gray mice – and had proved to be just as quiet, ... Both of them measured little more than five feet tall and stood perfectly erect.

**Night 1, minute 0:39:37** of ROSEMARY'S BABY the Mini-Series :

(8) Rosemary : (picks up a photo of a couple) : Standing right here in this exact spot when they took this picture.

**Night 2, minute 23:10** of "ROSEMARY'S BABY" the Mini-Series :

(9) Rosemary: Thank you. I'm sorry I wasted your time. ...  
Commissioner, **why would you have a picture of Margaux Castevet on your board?**

**Paris Police Commissioner :** This picture? *Maybe you did see a dead man.*

**Page 11, last paragraph, line 5** of 'The Groaning Road A TRUE STORY :

Since that night more than twenty years ago in the gray apartment with a photo of Hitler on the wall, I've not heard his voice nor seen him again.

Night 1, minute 0:45:30 of “ROSEMARY’S BABY” the Mini-Series :

**Pursuing her investigation of a “strange couple”, Rosemary is seated at the Paris Police Commissioner’s desk across from him and shows him a photo :**

(10)            **Rosemary** (to the Paris Police Commissioner):        Yes ... look (showing him a **photo**), that's in our apartment ...

**(11) Paris Police Commissioner:** You have an entire life that you imagined for them from this single snapshot.

**Rosemary :** **Yes. (Smiling) It's a little crazy, right?**

Night 1, minute 0:47:00 of ROSEMARY'S BABY the Mini-Series :

(12) **Paris Police Commissioner :** I'm sorry; the woman in the picture is dead. Her name was Nina Pascal; Egyptian born, no family in France. Preliminary report indicates she jumped from the balcony of her bedroom to her death.

(13) (Not only does the name “Nina” resemble the PLAINTIFF’s name, “Mina”, but many “Egyptian-born women are called “Mina”).

**Rosemary :**            *My bedroom ?*

Night 1, minute 0:53:15 of ROSEMARY'S BABY the Mini-Series :

Rosemary shows Julie the photo of the “strange couple” in cooking class :

- (14) **Rosemary :** ... This is Jacques and Nina. She died three months ago. **She either jumped or was pushed off a balcony of our bedroom.**

**Page 11, paragraph 2, line 1** of “The Groaning Road A True Story” :

G. and I both seemed to know better than to broach the subject of **the photograph, :**

**Night 2, minute 0:41:07** of ROSEMARY’S BABY The Mini-Series :

- (15) **Guy Woodhouse:** And Ro, I wouldn’t mention that picture to anybody.

(16) **Night 2, minute 0:56:00** of ROSEMARY’S BABY the Mini-Series :

Rosemary is seen flipping through the pages of an old book. She stops and stares at a black and white photo of an old man on one of the pages. The photo **takes up the entire screen for a moment**. She whispers *to herself* : “Steven Marcato” (whom she believes to be one of the **devil’s impostors in the past** — and who the FILM’s character “Roman Castevet”, turns out be in the present, an impostor of the devil).

17) **Night 2, minute 0:56:45** of ROSEMARY’S BABY the Mini-Series :

Rosemary looks up the name Steven Marcato on her **tablet computer** and we see on a single page photo head shots of a wide array of men, including those **who committed atrocities in the past, dictators** and a slightly blurred headshot of a man who resembles Hitler and who has a mustache over the center of his top lip.

(18) Night 2, minute 0:57:10 of ROSEMARY'S BABY the Mini-Series :

**As Rosemary continues to look at photos of “Steven Marcato”, we see another black and white head shot of him in a suit and tie that takes up the entire screen.**

(19)           **Rosemary to Guy :           It's an old picture. Look at his eyes. He and Roman are the same person...**

---

### Paranoia

**Page 9, paragraphs 4 and 5** of “The Groaning Road A TRUE STORY” :

Suddenly I felt another presence in the room and turned around quickly, my arms still raised and my mouth still open. I hadn't heard them enter the room, but they must have heard the doorbell. There behind me stood a couple, who more than anything looked like two little gray mice – and had proved to be just as quiet, but they also like somebody's harmless, elderly grandparents. Both of them measured little more than five feet tall and stood perfectly erect.

“*Bonjour*,” I managed to say, **startled**, lowering my arms and trying to look natural. Neither of them answered, except to nod in unison in one quick, jerky movement without blinking or making a sound – and without taking their eyes off me.

**Page 9, Paragraph 6, line 1** of “The Groaning Road A TRUE STORY” :

G. broke the spell by asking if I wanted to see his part of the house. I wanted nothing more than to follow him somewhere where we could talk, but knew that we wouldn't be able to do that anywhere in this house. I turned again to the little mice-like couple.



**Page 9, paragraph 4, line 3** of “The Groaning Road A TRUE STORY” :

**Struck with *fear* and *paranoia***, I decided that audible questions would have to wait as **the two gray mice *would surely be listening at the door.*** :

**Night 1, minute 0:38:00 of** ROSEMARY’S BABY The Mini-Series :

**In their apartment, Rosemary asks Guy what** he and Roman had been talking about when she’d seen them earlier by chance.

(20)                      **Guy :**                      **Rosemary, you gotta stop. You’re acting paranoid. Okay?**

**Page 11, paragraph 3, line 3** of “The Groaning Road A TRUE STORY” :

We both knew without saying it that **we wouldn’t be able to talk about anything substantive until we found ourselves somewhere else.**

**Night 2, minute 0:58:00 of** “ROEMARY’S BABY” the Mini-Series) :

**Rosemary : We’re not staying here anymore ! We’re leaving.**

Guy Woodhouse tries to reason with and calm **Rosemary, who is trying to pack and leave.**

(21)                      **Rosemary: “No, no! He might be in here! Don’t you understand?”**

...

**“They take your possessions and then they use them to control you or to kill you”.**

...

(22)                      ***Let’s go, ... please !***

...

***I'm gonna get the passports !***

---

Since That Night

**Page 11, last paragraph, line 5** of “The Groaning Road A True Story”

Since that night more than twenty years ago in the gray apartment with a photo of Hitler on the wall, I’ve not heard his voice nor seen him again.

**Night 2 ,minute 4:40** of “ROSEMARY’S BABY” the Mini-Series :

**Rosemary ( to Julie) :** “It’s Guy. I can’t put my finger on it. But he’s distracted. He looks right through me.”

**Julie:** “Well, have you spoken to him about it?”

(23) **Rosemary:** “He hasn’t touched me since that night” (*since the night she was **impregnated by the devil –or one of the devil’s impostors***).

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The PLAINTIFF’s Parties in Paris :

**Page 6, last paragraph** of “The Groaning Road A True Story”

**One evening during one of my rowdy Sunday brunches that resembled musical theatre and high drama at once, with the whole international gang from Kurdistan to Kent to Kalamazoo in attendance now, G. sat alternately singing and presiding at the center of the room. The whole bulk of his huge, brown body shook with laughter when**

**George**, who had arrived already **nearly drunk with two of his Parisian groupies in tow**, fell to the floor trying to give him a karate kick as a way of greeting. It occurred to me that *I had organized the party* for the two of them. G. exuded pure contentment at our friends' admiration of his singing talent. G.(eorge) seemed content to heckle him. No one enjoyed these impromptu party-concerts **more than the two of them and our** Parisian friends, who ventured out in search of cosmopolitan cultures much more than they invited others into theirs.

24) (In further adaptation of PLAINTIFF's character development, setting, scenes and storyline development, in "ROSEMARY'S BABY" the Mini-Series, the Castvets and their friends are no longer old, fussy, dowdy neighbors; *but a glamorous, international group of worldly-looking socialites attending parties — that are acted in the FILM by actors from the United States, Poland, France, Wales, England, Ireland, Russia, Japan, and Kazakstan*) :

Night 1, minute 11:49 of ROSEMARY'S BABY" the Mini-series

Rosemary Woodhouse : My husband — **he teaches at the Sorbonne.**

25) **Margaux Castevet** : My husband is on **the Sorbonne's** Honorary Board. You must come to a party ... here...tonight!

Night 1, minute 13:10 of "ROSEMARY'S BABY the Mini-Series:

26) **Rosemary** (to Guy Woodhouse) : This lady whose wallet I returned *invited us to her party.*"

Night 1, minute 14:16 of ROSEMARY'S BABY the Mini-Series :

**Chauffeur:** Mrs. Woodhouse?

Rosemary: Yes?

27) **Chauffeur:** I'm here to take you to a party.

Night 1, minute 14:55 of "ROSEMARY'S BABY" the Mini-Series :

During the first party (there are three) of the FILM held in their beautiful apartment in Paris we see the Castejets greet Rosemary and the **now Sorbonne English Professor Guy Woodhouse**) :

**Margaux Castejet :** Rosemary, you must come and mingle.

Page 5, last paragraph, line 1 of "The Groaning Road A TRUE STORY" :

He didn't speak French and didn't seem to  
have any plans to learn it; so inside our friendship, my  
lesser role seemed to be that of a handy conversationalist...

Night 1, minute 14:15 of ROSEMARY'S BABY the Mini-Series :

(28 & 29)            **Rosemary:**            Everybody's just so fascinating... I  
don't speak a word of French...

**Margaux Castejet :**    *S'il vous plaît* , in honour of my  
guest Rosemary Woodhouse, this  
night's festivities will now  
be conducted in English only.

Night 1, minute 15:00 of "ROSEMARY'S BABY" the Mini-Series :

(30)            **Paris Police Commissioner** (with a smug look on his face) :

Of course, Americans are known to speak just one language.

(31) **Margaux Castevet:** And the French are known to be arrogant pricks.

The dialogue immediately above in the FILM was adapted from **p.7, para. 1, \_\_\_\_\_ line 6 of “The Groaning Road A TRUE STORY”**) : No one enjoyed these impromptu party-concerts more than the two of them and “our *Parisian friends, who ventured out in search of cosmopolitan cultures much more than they invited others into theirs.*”

Night 1, Minute 15:38 of ROSEMARY’S BABY the Mini-Series :

(32 & 32) **Margaux Castevet:** The secret to a lively party is new and interesting guests.

Night 1, minute 16:00 of “ROSEMARY’S BABY” the Mini-Series :

Roman Castevet leads Guy Woodhouse away to meet **the Castevets’ international cosmopolitan guests**) :

(33) **Roman Castevet :** Let’s go show the Frenchmen what a real intellectual looks like.

**(“Roman’s” above dialogue is also adapted from page 7, para. 1 line 6) :**

“...our Parisian friends, who ventured out in search of cosmopolitan cultures ...” - **p.7, para. 1, line 6 of “A TRUE STORY”**)

...

(34) **Guy Woodhouse :** Thank you for a lovely evening.

(35) **Roman Castevet :** *This is Paris, we're just getting started.*

Night 2, minute 0:39:20 of ROSEMARY'S BABY the Mini-Series :

(36 & 37) **In in this scene** in a nightclub on a boat in Paris on the River Seine Rosemary and Guy Woodhouse, the Castevets couple and their French and international friends are seen at a baby shower party — champagne and all — to celebrate the upcoming birth of Rosemary's baby.

*ALL of the above Party scenes, as well as most of the dialogue in them — as in still other scenes that the PLAINTIFF has noted (and will note further in this LIST OF RESEMBLANCES— were developed from several written descriptions in “The Groaning Road A TRUE STORY of the PLAINTIFF’s lively Parisian parties and her fascinating international guests (including G. and George who didn’t speak French, and the French “who ventured out in search of cosmopolitan cultures much more than they invited others into theirs...”*

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Nightclubs, Concerts, The Past, Adolescence, Cynicism, “Cheerleader” “Groupies” and “Inspiration” :

ALL of the Paris Nightclub Scenes in ROSEMARY'S BABY the Mini-Series reveal **resemblances to setting, storyline descriptions and dialogue** in a nightclub scene — as well as in scenes en route to the club — found in the PLAINTIFF's “The Groaning Road A TRUE STORY” :

Night 2, minute 109:50 of “ROSEMARY'S BABY” the Mini-Series :

Attending a concert in the center of Paris :

(38) In this scene Rosemary Woodhouse and Margaux Castevet are seen leaving a concert in the center of Paris. Elegantly dressed, giggling and chatting, they enter an upscale, well-known restaurant where we see Guy Woodhouse and Roman Castevet seated together at a table talking over drinks :

**Page 2, Paragraph 2 , line 2** of “The Groaning Road A TRUE STORY” :

... attending a jazz concert at Chatelet or Saint-Germain des Près, *where we were regulars among the extended family who basked in the music. At least three nights a week (we) blended harmoniously into the scene like integral parts of melodious, pulsating art installation.*

“Here come the odd couple,” announced George Brown, another ex-patriot and the best drummer in all of Europe, always happy to see us. “And one of y’all is real odd all by himself,” he continued, never missing an opportunity to tease G. about being gay. They both grinned widely at each other. *Gay men had shaped the music at the church George had grown up In (in) Flint and at sixteen he was playing for Motown.*

*“I was on fire, y’all”!* Anyone who’d heard him play knew he didn’t need to feign modesty. Billy Holiday and Wes Montgomery had found out and introduced him (to) the world. That G. happened to be gay and had brought part of his musical heritage across the ocean to Paris was all he needed to know to bond with him.

**Night 2, minute 12:20** of ROSEMARY’S BABY the Mini-Series :

**The Scene, Setting, Characters and dialogue :**



- 39) (In this scene in the FILM at a Paris nightclub, we see and hear how a “Producer” is “transported” “back in time” to his and the now writer-English Professor “Guy Woodhouse’s” “adolescence” (like back in time to the PLAINTIFF’s nightclub drummer “George’s” adolescence; and with “Guy Woodhouse” now a writer and Professor of English like the PLAINTIFF.

**Page 6, paragraph 2, line 2** of “The Groaning Road A TRUE STORY

*We saw our fleeting lives swing back and forth like the pendulum of a grandfather’s clock, gliding tick-tock over a nanosecond and pulling the present and the future into the past in one stroke.*

- 40), 41 & 42) :     **Producer #1** : “Can I just say something? **When I read your book, I was transported — I mean truly — to my adolescence, before the cynicism of being an adult — you know what I mean? I went back in time. And I expect that is what will happen with the audience :**

**Page 7, paragraph 2, line 1 (Cynicism) :**

“Is it because singing assures people that we’ve forgotten the past if we’re smiling and snapping our fingers and swaying to the music?” I had asked G. months earlier.

“Stop it, you,” he’d said soberly. “Just sing for yourself; and if anybody else likes it, let that be a welcome footnote to the story.



**Page 4, paragraph 1, line 1 (Cynicism) of “The Groaning Road A TRUE STORY” :**

“It’s painful attending service at the American Church in Paris”, I said to him one day as if out of the blue, adding, “There so many evil people up in there it’s like participating in organized crime against oneself and against someone they seem to think of as an unseeing, helpless God whom they mockingly refer to as the ‘Almighty’.”

“Their plan has nothing to do with God” he answered; “it simply amounts to an attempt to promote an invented superiority in order to dominate others, especially us”.

“Domination is not a crime?” I wondered aloud.

**“Only when the dominated participate willingly,” he added, smiling ruefully.**

**“Maybe I’m just participating in a clinical study,” I objected defensively.**

“Of what?”

“Of pedophile pastors with PhD’s who speak of a world created in seven days and salute me with pained grimaces, reluctant handshakes and constant reminders that much worse than that has to be forgiven through the enlightening love of Jesus.”

“And you need to wake up at eight o’clock Sunday morning to do this study?” he grinned. I often let him win the argument by grinning back, like I did this time; even though I wanted to say yes, that I was wholly intrigued with that group of believers who demonstrated such obvious disdain for others.

**Page 2, paragraph 2, line 2 of “ The Groaning Road A TRUE STORY “ :**

**... attending a jazz concert at Chatelet or Saint-Germain des Près, where we were regulars** among the extended family who **basked in the music.** At least three nights a week **blended**

**harmoniously into the scene like integral parts of melodious, pulsating art installation.**

**Page 3, paragraph 3, line 1** of “A TRUE STORY” :

G. and I scheduled two or three of **these magical nights on the town every week** according to what group was going to be playing *at the clubs* and suffered through the smoke-filled air of Paris’ nightclub scene of the 80’s.

**Page 3, Paragraph 3, line 5** of “A TRUE STORY” :

The music, the warmth and laughter of the after hours made it all worthwhile.

**Page 3, paragraph 2, line 1** of “A TRUE STORY” :

George and I knew that I wanted him to dump all of his Parisian groupies **and just be in love with me**, but that that wasn’t going to happen anytime soon,...

**Night 1, minute 36:36** of ROSEMARY’S BABY the Mini-Series :

**We see Roman Castevet and Guy Woodhouse** riding through Paris streets on a magical night that is bathed in streaks of blurred soft lights, **known to the “City of Light”** (Page 1, paragraph 2, line 8). While discussing “Guys” writing, Roman Castevet announces the itinerary to his chauffeur :

43) **Roman Castevet:** “Pierre! the Club please”.

**Page 3, paragraph 3, line 1** of “The Groaning Road A TRUE STORY” :

G. and I scheduled two or three of these magical nights on the town every week according to what group was going to be playing at the clubs and suffered through the smoke-filled air of Paris' nightclub scene of the 80's, ...

(44) Night 1, minute 37:05 of ROSEMARY'S BABY the Mini-Series :

In this nightclub scene in the FILM we see **Guy and Roman walk into a trendy Paris nightclub**. We also see a barman and patrons seated at tables. We even see smoke floating in the air. **Attractive, scantily dressed women are swaying slowly, twisting and pulsating sensually to bluesy Jazz music. Some of the women strike smiling, inviting poses in front of the two men; some of the women are enlaced with men at the bar. One of the women reaches out and touches Guy who, showing interest, looks back to smile at her.** Guy and Roman finish their discussion over drinks at the bar

(45) Night 2, minute 12:20 of ROSEMARY'S BABY the Mini-Series

In yet another nightclub scene we see **the interior of a Paris nightclub where "Guy Woodhouse", "Roman Castevet" and two "film producers" are having drinks at the bar :**

**Roman (making a toast) :** To the genius, Guy Woodhouse!

**Producers :** Cheers!

...

46) **Producer 1 :** Roman, this looks like a hot club; why don't you show us around? (We hear the sound of Jazz music rising)

George and I knew that I wanted him to dump all of his *Parisian groupies* and just be in love with me, but that that wasn't going to happen anytime soon, and that I wasn't going to give in to his shyly cautious invitations until it did. So the flirting just went round and round as each one surveyed the degree of the other's seriousness from the corner of a furtive eye. The fact that I came from Mississippi as his mother had was just about all he needed to know about me to keep trying ...

---

The success of artists, their admirers and groupies (or "cheerleaders")

Page 3, paragraph 2, line 1 of "The Groaning Road A TRUE STORY" :

George and I knew that I wanted him to dump all of his Parisian groupies and just be in love with me, but that that wasn't going to happen anytime soon,

Page 7, paragraph 1, line 1 of "The Groaning Road A TRUE STORY" :

G. sat alternately singing and presiding at the center of the room. The whole bulk of his huge, brown body shook with laughter when George, who had arrived already nearly drunk with two of his Parisian groupies in tow, **fell to the floor trying to give him a karate kick as a way of greeting. It occurred to me that I had organized the party for the two of them.**

Night 1, minute 109:50 of "ROSEMARY'S BABY" the Mini-Series :

**The success of artists, their admirers and groupies (or "cheerleaders") :**

Rosemary:            Look at my husband. Does he look happy to you?

47) **Margaux :** You know, success is sometimes hard to accept. Wait until he has trouble in bed, then you really have to be a cheerleader. ( dialogue adapted from “the admiration of their fans” in The TRUE STORY. Margaux’s dialogue about “cheerleaders” is connected to NOTHING in the FILM).

48) Night 1, minute 1:01:15 of ROSEMARY’S BABY the Mini-Series :

In this scene, Professor of English and writer “**Guy Woodhouse**” leaves class followed by four visibly admiring young women students – all beaming and smiling at him like his own student “groupies”:

*Female Student :* “So you don’t write poetry?”

**Guy Woodhouse :** No, no I don’t. When I was your age I did, but...

...

“ **Well, Ladies.** Be sure to do the reading for tomorrow”.

**The women students** (in chorus, smiling) : “We will! Bye!”

Pleased by the attention, Guy glances back at the young women, still staring at him and smiling in his direction, and smiles at them.

...

**Jacques** (to Guy) : It’s an art the seduction, you know.

---

Emotions and Cynicism :

Page 8, paragraph 2, line 1 of “The Groaning Road A TRUE STORY :

“After serving today’s carefree throng of revelers all afternoon, including two of my boyfriend’s mistresses, it sounds like a great plan,” I deadpanned.

In complicity with George he smiled through a silent chuckle that shook his body. “It’ll help you understand that *musicians really only love their instruments and the admiration of their fans.*”

Night 2, minute 48:20 of ROSEMARY’S BABY The Mini-Series :

(49) **Margaux Castevet:** You’re a man; you have the ability to disassociate your emotions from your penis.

(50) **Guy Woodhouse:** *You’re a scenic.* I mean it was easier **to have feelings for her again.**

(51) **Margaux :** *Avoid that.* Emotions just make things harder.

“The pleasures of this world” and “fleeting lives” :

Page 5, last paragraph, line 3 of “The Groaning Road A TRUE STORY”:

That’s how we explored Paris, the retiree and the student, crisscrossing the city and its charming neighborhoods, most of them still timeless yet caught action like animated three dimensional postcards. We often walked in somewhat of a hurry, always thinking we would never have enough time to discover every magnificent hidden courtyard in the city, their medieval brick floors sinking unevenly, their cracked, gray walls covered with vines; or the ones with a single rose growing out of an ancient stone vase. Most of the time, we only glanced at the sidewalk cafes and pricy boutiques as we passed.

**Page 6, paragraph 2, line 2** of “The Groaning Road A TRUE STORY” :

We saw our fleeting lives swing back and forth like the pendulum of a grandfather’s clock, gliding tick-tock over a nanosecond and pulling the present and the future into *the past in one stroke.*

**Night 1, minute 19:50** of ROSEMARY’S BABY the Mini-Series:

52) **Margaux Castevet:**      **They say one life is not enough to enjoy the pleasures of this world.I wish for you nine more.**

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**A Paid Pause :**

**Page 5, last paragraph , line 6** of “The Groaning Road A TRUE STORY”

Most of the time, we only glanced at the sidewalk cafes and pricy boutiques as we passed. The sights could be just as satisfying as a paid pause.

**Page 6, paragraph 1, line 5** of “A TRUE STORY” :

On some days **we followed the river**, winding through the most popular neighborhoods to the richest ..., :

**Night 2, minute 4:05** of ROSEMARY’S BABY the Mini-Series :

53) In this scene we see “**Rosemary**” and “**Julie**” on another walk through **Paris**, this time through a popular neighborhood frequented by people of all walks of life. “Julie” is walking toward “Rosemary” holding two drinks



in go-cups held high in her outstretched arms. She gives one to Rosemary and takes a sip from hers.

The scene continues as “Rosemary” and “Julie” stop to watch, and very obviously enjoy, a group of shirtless, male Brazilian drummers and dancers.

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**“Inspiration”**

**Page 2, last paragraph** of “The Groaning Road A TRUE STORY” :

“Here come the odd couple,” announced George Brown, another ex-patriot and the best drummer in all of Europe, always happy to see us.

**Page 3, Paragraph 1** of “The Groaning Road A TRUE STORY” :

“And where would you find the slightest inspiration without us?” I wanted to know. :

54) Night 1, minute 0:37:30 of ROSEMARY’S BABY The Minii-Series :

**Guy Woodhouse and Roman Castevet** are *at a club*, seated at a table. :

**Roman :** In order to be a success, everyone needs to find two special people. My first was Margaux.. She made me whole.

**Guy :** Yep. That’s what Rosemary does.

55) Night 1, minute 0:59 :10 of ROSEMARY’S BABY The Mini-Series :



**Guy :** Roman really loved it too; he says he's gonna take it to his publisher.

**Rosemary :** You gave it to Roman?

**Guy :** Well, I had to. If it ween't for him I wouldn't have written it; he's practically my muse.

**Rosemary :** I've been replaced by man.

Night 1, minute 1:10:05 of "ROSEMARY'S BABY" the Mini-Series :

**Margaux:** Roman, let's walk. I need to clear my head of the wine.

**The two couples walk through another magical, beautifully lit Paris night.**

**Rosemary:** I was jealous of you.

**Roman:** Me?

56) **Rosemary:** You got to do in two weeks what I couldn't do in two years. You got Guy to finish his book. He told me you were his muse.

(The PLAINTIFF left the set of the filming of ROSEMARY'S BABY the Mini-Series two years almost to the day after she e-mailed her TWO SHORT STORIES to HOLLAND — February 2012 to February 2014)

57) **Roman:** I wish I had that kind of power. You know, inspiration is a mystery. You know what inspired Napoleon to propose to Josephine? That restaurant we were sitting in. That very booth. With Guy, who knows? Maybe it's the apartment; maybe it's your sweet breath on the pillow.

**Page 3, Paragraph 1** of “The Groaning Road A TRUE STORY” :

“And where would you find the slightest inspiration without us?” I wanted to know. :

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### **The Past**

In this nightclub Scene a “**Producer’s**” near *verbatim* dialogue was adapted from the Bridges Passage in “The Groaning Road A TRUE STORY”. This scene is *evidence* of how **HOLLAND, the director; ABBOTT and WONG the scriptwriters, and the PRODUCERS** of ROSEMARY’S BABY the Mini-Series *used the some of the same passages and descriptions* from “The Groaning Road A TRUE STORY” for more than one scene in the FILM :

**Page 7, paragraph 2, line 1** of “The Groaning Road A TRUE STORY” :

“Is it because singing assures people that we’ve forgotten the past if we’re smiling and snapping our fingers and swaying to the music ?” I had asked G. months earlier.

**Page 6, paragraph 1, line 2** of “The Groaning Road A TRUE STORY” :

We crossed the Seine almost daily, ... On some days we followed the river, winding through the most popular neighborhoods to the richest, **watching far-off bridges meet us for a few seconds then fade quickly into the past.** On the way back the same ones beckoned to us from the future again, centuries’ old and omnipresent and omniscient. **Like Paris’ bridges, we consciously catalogued the past,** the present and the future on one index card, all three jumbled together in no special order.

Experience had taught us that every day we could find something new that has been there for some time – or we wouldn't be looking for it now. We saw our fleeting lives swing back and forth like the pendulum of a grandfather's clock, gliding tick-tock over a nanosecond and **pulling the present and the future into the past in one stroke.** It seems strange that **time** itself **tempts us** to constantly try and **reinvent** the present and the future – and often the past (but the latter can't be dealt with so easily; it slides up to the other two all at once, shouts Boo! and tugs at them with steady hands until each one follows it or slides alternately to the left and right of it, until they bunch together swaying in a line dance of three doing the Madison). Evidence of how the future and the present, **quickstepping, lockstep with the past** is of course found everywhere but **especially in Paris it seems, where the latter looms on prominent display :**

Night 2, minute 12:20 of ROSEMARY'S BABY the Mini-Series

(At a Paris nightclub )

58)           **Producer #1:**       Can I just say something? **When I read your book, I was *transported* – I mean truly – to my adolescence, before the cynicism of being an adult – you know what I mean? *I went back in time*.** And I expect that is what will happen with the audience.

**Producer 2 :**       If we get the right star.

**Producer 1 :**       That goes without saying.

The BRIDGES along the River Seine in the Center of Paris :

Page 6, paragraph 2, line 2 of “ A Groaning Road A True Story” :

**We crossed the Seine almost daily, never forgetting to turn our heads to the left and right, no matter which one we were crossing, whether headed toward the Right Bank or the Left, to marvel at the beautiful spectacle of the stately bridges hovering majestically over it and receding knowingly into the distance. On some days we followed the river, winding through the most popular neighborhoods to the richest, watching far-off bridges meet us for a few seconds then fade quickly into the past. On the way back the same ones beckoned to us from the future again, centuries’ old and omnipresent and omniscient. Like Paris’ bridges, we consciously catalogued the past, the present and the future on one index card, all three jumbled together in no special order.**

59) Night 1, minute 7:05 of ROSEMARY’S BABY the Mini-Series :

In this scene we see again how HOLLAND the director; WONG and ABBOTT the scriptwriters, and the PRODUCERS of ROSEMARY’S BABY The Mini-Series **combed through and used particular paragraphs and passages** from “The Groaning Road The TRUE STORY in more than one scene in the FILM :

*In a popular neighborhood in the center of Paris*, we see the two best-friends Rosemary and Julie in a scene where they are walking along the River Seine, arm-in-arm. The bridges, which are omnipresent from the beginning of the scene to the end of it, are also the main focal points. Because *for a full minute and 20 seconds*, as they *“follow the river”*, arm-in-arm and chatting, we see “stately bridges hovering majestically over it” ...

In addition, in this scene in the FILM the bridges are sometimes seen far off, sometimes as close backdrops; other bridges can be seen nearby and at times “hovering over” the heads of the actresses. **At the end of this long scene a boat passes under yet another bridge as Rosemary and Julie stand looking and discussing little else other than cooking classes and *Guy’s writing*.**

60) Night 2, minute 1:16:00 of ROSEMARY’S BABY the Mini-Series :

Rosemary and Guy are seen standing on the deck of a boat and overlooking the River Seine in Paris as Rosemary tells Guy she is going to leave him and go back to New York. The boat passes under a bridge. Other bridges can be seen in the background :

61) Night 2, minute 1:23:23 of ROSEMARY’S BABY the Mini-Series :

In this last scene of the FILM, Rosemary is seen pushing a stroller with her baby along the River Seine in Paris.

**Penny Pinching and a New Apartment :**

**Page 7, paragraph 4, line 5** of “The Groaning Road A TRUE STORY :

The one thing that bothered me about him was how carefully he counted his money. He went to such extremes to keep from spending a few francs that it pleased me to learn he had finally splurged to rent his own place. He soon clarified things by saying that actually that he’d rented a room in an apartment and had roommates. *Oh, well*, I thought.... It was not quite what I’d had in mind for him but it did fit his penny-pinching personality.

**Night 1, minute 0:26:15** of ROSEMARY’S BABY the Mini-Series :

**The Castevet couple offers Guy and Rosemary Woodhouse a beautiful apartment to rent in Paris for not a lot of money :**

- Margaux ;** We have an empty apartment at the Chimère.
- 62) **Rosemary :** No. I don't think you understand how much an English professor earns. We couldn't even afford your building for a weekend.
- Margaux :** "We own it; **we charge whatever we want.**
- Roman ;** It's just sitting there empty ... **you can pay the same rent you're paying now; you'll be in profit.**
- 
- 

### The Dates

#### Page 3, paragraph 3, line 1 of the Groaning Road A TRUE STORY :

G. and I scheduled two or three of these magical nights on the town every week according to what group was going to be playing at the clubs and suffered through the smoke-filled air of Paris' nightclub scene of the 80's, ...

#### Page 10, paragraph 2, line 6 of "The Groaning Road A TRUE STORY:

... and maybe like he probably did, I wanted to know more about these Nazis living in the middle of Paris in 1988, fifty years older than the two young men I'd witnessed saluting each other nearly two years earlier (1986) in the subway at Port Royal, one arm stretched out and

shouting, “Hail Hitler!” I had nearly forgotten them.

**In the FILM, The Paris Police Commissioner has been trying to piece together the puzzles to unsolved murders that have taken place “over the past 30 years” (1984 to 2014), some of them in the building where Rosemary found the photo. The Commissioner asks Rosemary whether she has talked to Mrs.Castevet, “who might know the whereabouts of this strange, mysterious couple” :**

Night 1, minute 0:56:30 of ROSEMARY’S BABY the Mini-Series :

**63) Father Tekem :** Terrible things have happened ever since **La Chimère** rose from the ground. **The building is cursed. Steven Marcato lived there until 1986.**

Night 2, minute 23:10 of “ROSEMARY’S BABY” the Mini-Series :

**64) Paris Police Commissioner :** “Sorry, Rosemary; I have investigated thoroughly. Steven Marcato has not been seen by anyone for almost thirty years”.

(“almost thirty years” before 2014 would be close to 1986 and 1988 )

...

**Rosemary :** Commissioner, I don’t understand; if Steven Marcato has been dead for years how could he have possibly killed all those women?

**65) Paris Police Commissioner (2014): He disappeared about thirty years ago. Around the same Roman Castevet came into a fortune and bought “La Chimer**



Night 2, minute 1:00:50 of ROSEMARY'S BABY the Mini-Series :

**Roman Castevet : My building ? Are you sure? La Chimère?**

66) **Paris Police Commissioner : Yes. ... Over the last 30 years.**

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The Silent, Staring Man with Piercing Eyes :

**Page 8, paragraph 5, line 7 of "The Groaning Road A TRUE STORY :**

**There was no other furniture in the immense room –  
no end tables, no coffee table, no lamps, no book-  
shelves, nothing else – except for one other object:  
on the wall above the sofa a photo of Hitler, black and  
white though it was, obliterated every trace of the gray  
carpet, sofa and armchair; then, due to the emptiness  
of the room, the portrait headshot multiplied  
itself exponentially.**

67) Night 1, minute 1:00:30 ROSEMARY'S BABY the Mini-Series :

**IN THIS SCENE IN THE FILM, THAT WAS ADAPTED  
FROM THE LAST PARAGRAPHS OF "A TRUE STO-  
RY", ROSEMARY UNEXPECTEDLY MEETS A DIS-  
TURBING SILENT MAN IN HER BUILDING WHO  
STARES INTO**

**HER EYES, AND WHO INTRIGUES AND FRIGHTENS  
HER AT THE SAME TIME. IN ONE FRAME WE ONLY  
SEE A CLOSEUP HEADSHOT OF THE SILENT MAN  
AND HIS PIERCING EYES. THE MAN'S FACE IN THIS**



FRAME TAKES UP THE ENTIRE SCREEN. THEN HE  
VANISHES IMMEDIATELY — WITHOUT A TRACE.

ROSEMARY, STARTLED AND SHAKEN, SEARCHES FOR  
THE SILENT, MYSTERIOUS MAN BUT SHE CAN'T FIND  
HIM. SHE

GOES BACK INTO THE BUILDING AND ASKS THE  
CONCIERGE

IF HE HAD SEEN THE MAN. THE CONCIERGE ANSWERS,  
“NO”.

Night 2, minute 0:23:15 : of ROSEMARY'S BABY the Mini-Series :

In this scene Rosemary is again startled by man she believes to be Steven Marcato in the stairway of her building. Again, we see a large headshot of the man on the screen.

Man : Be strong, Rosemary, for the baby.

Night 2, minute 0:23:50 of ROSEMARY 'S BABY the Mini-Series :

68) **Paris Police Commissioner** : So you saw someone you think  
was Steven Marcato in your  
building.

Rosemary :

It was.

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---  
Rosemary Acting Strangely for a Couple of Weeks or “Since That Night” :

**Page 11, paragraph 8 of “The Groaning Road A TRUE STORY”:**

... I said I'd call the next day. I kept my word, **but the phone rang and rang to no answer. *I telephoned his number every day for weeks. I even knocked on the door once, and stood on the street looking up at the window of that apartment I don't know how many times — all (to) no avail. Since that night* more than twenty years ago in the gray apartment with a photo of Hitler on the wall, I've not heard his voice nor seen him again.**

**Night 2, minute 4:25 of ROSEMARY'S BABY the Mini-Series :**

**Julie:** Are you O.K.? You've been acting like this **for a couple of weeks.**

**Rosemary:** I know. Ever since Baby Night.... he hasn't touched me ***since that night. (verbatim dialogue)***

**Guilt and Amnesia :**

**Page 12, paragraph 2 of “The Groaning Road A TRUE STORY” :**

Since they surfaced — nagging persistently — and I began to tell the story, several people have asked me why I didn't go (to) the police. And tell them what, I ask? How could I possibly tell the Police anything? Because for over a decade I blocked the story and G's entire existence out of my conscious mind and buried them deep in my sub-

conscious, so impossible had *that evening and the following weeks* been for me to accept.

Night 2, minute 43:00 of ROSEMARY'S BABY the Mini-Series :

69) **Paris Police Commissioner** : "None of them were reported missing by *family or friends*.  
No one claimed the bodies.

Night 2, minute 0:1:15 of ROSEMARY'S BABY" the Mini-Series :

**On the morning after she has been raped by "Satan"** (or the strange man who had gazed into her eyes in her building ; who had intrigued and frightened her  
70) and then suddenly disappeared) *Rosemary doesn't remember any of the horror* :

**Guy**: "Hey, Ro! Come on!"

**Rosemary**: "*What time is is?*"

**Guy**: *It's late; wake up.*

**Rosemary**: *Baby, I'm sorry. I must have passed out.*"

...

**Rosemary**: You mean we did it?... How could I not remember anything? (She tries to arouse her husband and says to him) : "I'm awake now." (Her attempts to arouse him don't work).

**Guy** : "It's not your fault."

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**The PLAINTIFF's title "The Groaning Road A TRUE STORY" inspired scenes and dialogue in ROSEMARY'S BABY the Mini-Series :**

**Night 2, minute minute 0:5:40 of ROSEMARY'S BABY the Mini-Series :**

**On a tour of the Catacombs of Paris, a tour guide reads what's written on the wall of the underground :**

71) **Paris Tour Guide:** **" 'Stop! This is Death's Empire'. ... It's a warning we ignore today. Over *six million* Parisians are buried here underground. They are all anonymous; no one is remembered here in the Catacombs.**

72) **Tourist :** **"So the whole city is built over these bones?"**

73) **Paris Tour Guide:** ***Oui.* We are six stories below where you might be sitting in a café enjoying a cappuccino Some of the best addresses in Paris are said to be built over the souls of the damned.**

74) **We see Rosemary fall through the floor of the Catacombs, seeming to be buried underground herself; but in the next scene we see that she has only fainted.**

**Epilogue : In Some of the DEFENDANTS own words :**

**Night 1, minute 0:36:15 of ROSEMARY'S BABY the Mini-Series:**

**Guy Woodhouse :** I speak like a writer writer and I think like a wrier but I just can't actually write (pauses) ... *my own words.* **(Speaking for ABBOTT, WONG or HOLLAND ? )**

**Night 2, minute 0:12:20 of ROSEMARY'S BABY The Mini-Series.**

**Producer# #:** So we'll let the lawyers talk and that's that.

**FOREWORD to the LIST of RESEMBLANCES  
of ROSEMARY'S BABY The Mini-series to The Groaning Road  
The FICTIONALIZED STORY**

**To the PLAINTIFF**, watching ROSEMARY'S BABY The Mini-Series and realizing how the DEFENDANTS mined BOTH of her SHORT STORIES, "The Groaning Road A TRUE STORY" and "The Groaning Road The FICTIONALIZED STORY, for this one film, feels like being gang-raped by a group of wealthy, arrogant, entitled men and women who are threatening murder.

**To the PLAINTIFF, watching** ROSEMARY'S BABY The Mini-Series while re-reading her creations "The Groaning Road The TRUE STORY" and "The Groaning Road The FICTIONALIZED STORY" feels like watching your children being gang-raped by a group of wealthy, arrogant, entitled men and women who are threatening murder.

For, not knowing who initiated them, **the PLAINTIFF has received death threats**. One of these death threats said, **"If you step one foot in this country, your life will be in danger."** Another one said, **"Anywhere you go we will find you."** And yet another one said, **"Just how much is a life worth today?"**

The PLAINTIFF's computer and three of her e-mail accounts have been hacked. The PLAINTIFF was **told by Yahoo! technicians that the reason she could not access her Yahoo! Account is because "it is being controlled from two different locations."** Revisions of "The Groaning Road The TRUE STORY" and "The Groaning Road The FICTIONALIZED STORY" – revisions that are not listed in this complaint, and that PLAINTIFF never let anyone read – **were mysteriously deleted from the PLAINTIFF's computer**. The PLAINTIFF would like to know how **descriptions and dialogue from these single revisions of the two said SHORT STORIES, that she never shared with anyone, ended up in ROSEMARY'S BABY the Mini-Series**.

HOLLAND, the director of ROSEMARY'S BABY The Mini-Series, has stated that women should "stand up for themselves".

Standing up for herself is what the PLAINTIFF is doing in this COMPLAINT.

**A Six-Page Preface  
to the**

**LIST OF RESEMBLANCES Found in ROSEMARY'S BABY the Mini-Series  
to**

**“The Groaning Road The FICTIONALIZED STORY” :**

**(If it pleases the Court, a separate LIST OF RESEMBLANCES that are found in) the film “ROSEMARY’S BABY the Mini-Series” to the PLAINTIFF’S SHORT STORY entitled “The Groaning Road A True STORY” is also being submitted as part of her Complaint against the DEFENDANTS).**

**Agnieszka HOLLAND, the director of ROSEMARY’S BABY the Mini-Series, stated in an interview with Radio Praha in January 2013 concerning another of her films, and nearly one year after she e-mailed the PLAINTIFF to congratulate her for “The Groaning Road The TRUE STORY” and “The Groaning Road The FICTIONALIZED STORY” :**

**“There’s some amount of fiction here. We decided to mix fiction with the real story. But it was fictionalized. Half of the characters are real and half are compilations of characters.”**

**HOLLAND wrote in one of her several e-mails to the PLAINTIFF of the “real pleasure and interest” she felt while reading the PLAINTIFF’S TWO SHORT STORIES. Moreover, in that same e-mail HOLLAND also wrote that she found the PLAINTIFF’S characters in these TWO STORIES to be “vivid” and “sensual”.**

**Dear Aminah! I am really sorry I didn’t write you sooner; was way to busy with my shooting, then travels around the world, editing etc to focus properly on your stories. I read them now with the real pleasure and interest. It is well written, with the personal voice and vivid, sensual characterization. The story about G and Hitler’s portrait is strong and subtle “short**

story” in the best American literature way, the second one seems to me to be one chapter of the longer novel, it is intriguing, but doesn’t work like the independent short story, rather as a fragment of the bigger one. I don’t know what were your intentions and neither what plans do you have with this writing. Anyway, I feel the vibrant tone and your - so original - point of view and will be curious to read and know more of your work. All my best - Agnieszka  
Sent from my BlackBerry wireless handheld. (Emphasis that of the PLAINTIFF)

(See HOLLAND’s E-mails of July, 2012 and January, 2014)

In the LIST OF RESEMBLANCES that follows this Preface, the PLAINTIFF intends to demonstrate to the Court and to the women and men of the jury that *the several dozens of very close and flagrant resemblances that are found in the film “ROSEMARY’S BABY the Mini-Series” to her SHORT STORY entitled “The Groaning Road The FICTIONALIZED STORY” could not possibly be coincidences.*

The nearly seventy-five (75) resemblances found in ROSEMARY’S BABY the Mini-Series to *EACH* of the PLAINTIFF’s TWO SHORT STORIES include those to several characters, the setting, the storyline, the timeline, descriptions of scenes, adapted dialogue within similar scenes, *verbatim* dialogue within similar scenes, verbatim dialogue that is spoken by similar characters in similar scenes and circumstances, and exact dates.

Agnieszka HOLLAND, director of ROSEMARY’S BABY the Mini-Series, not only read, but enthusiastically critiqued in one of several e-mails BOTH OF THE PLAINTIFF’s SHORT STORIES concerned in this Complaint (See the list of e-mails that that were exchanged by HOLLAND and the PLAINTIFF). In that particular e-mail HOLLAND wrote of the PLAINTIFF’s “vivid”, “sensual” characters; and of the “real pleasure” she felt while reading the TWO SHORT



*STORIES, which she deemed to be “intriguing” and “in the tradition of the best American short stories”.*

The PLAINTIFF asks, then, how *the TWO SCREENWRITERS* of ROSEMARY’S BABY the Mini-Series could have reproduced *in one film* many more than *one hundred* resemblances *to these same TWO SHORT STORIES* without having had access to them.

It is a given that *any one* of these close resemblances found in ROSEMARY’S BABY the Mini-Series to “The Groaning Road A TRUE STORY” and to “The Groaning Road The FICTIONALIZED STORY” could not stand alone as proof of infringement. However, the PLAINTIFF humbly asks the Court and the jury to read BOTH LISTS OF RESEMBLANCES, to read BOTH SHORT STORIES that the PLAINTIFF e-mailed to HOLLAND on January 20 of 2012 and to watch the FILM “ROSEMARY’S BABY the Mini- Series” — to read, to listen to and to look at the evidence within the *whole story*; and then to consider the *astounding number* of RESEMBLANCES that are found in the FILM to the PLAINTIFF:’s TWO SHORT STORIES.

Thus, in addition to LIST OF RESEMBLANCES that are found in “ROSEMARY’S BABY the Mini-Series” to the PLAINTIFF’s “The Groaning Road The TRUE STORY”, we submit this LIST OF RESEMBLANCES that are found in that *same* FILM to “The Groaning Road The FICTIONALIZED STORY”.

As will be shown in detail in the LIST that follows this PREFACE, these resemblances more specifically include, but are not limited to :

(1) an interracial couple *just recently arrived* (2) in Paris, of which (3) a writer (like the PLAINTIFF), who is also (4) a Professor of English (like the PLAINTIFF and like one of the PLAINTIFF’s characters in the FICTIONALIZED STORY) at a (5) university in Paris (like the PLAINTIFF and also like the PLAINTIFF’s character); and of which (6) a young African-American woman who has (7) a best friend “Julie” — who (8) is blond, (9) is Christian, and (10) who likes to drink,



**(11) who likes to tease in good humor; (12) who likes to flirt, and (13) who has gone too far romantically with her African-American friend “Rosemary”’s husband (all characteristics of “Julie” that resemble the characteristics of the PLAINTIFF’s character “Andréa” in “The Groaning Road The FICTIONALIZED STORY.**

**We note that no such “Julie” character exists either in the original film “Rosemary’s Baby” or in Ira Levin’s novel by the same name, or in his novel entitled Son of Rosemary.**

**The character “Julie” in the ROSEMARY’S BABY The Mini-Series was inspired by the PLAINTIFF’s writing in “The Groaning Road The FICTIONALIZED STORY” ).**

**ADDITIONAL CLOSE RESEMBLANCES in the FILM to the PLAINTIFF’s “The Groaning Road The FICTIONALIZED STORY” include, but are still not limited to :**

**(14) a now African-American “Rosemary Woodhouse” confiding in her best friend “Julie” about her obsession with someone’s disappearance from an apartment in Paris (like the PLAINTIFF’s African-American character “Jerri” confides in her best friend “Andréa” about her obsession with someone’s disappearance from an apartment in Paris, (15) a now African-American Rosemary *actively investigating* that person’s disappearance from a building in Paris, (just as the PLAINTIFF’s two African-American characters “Jerri” and “Tracey” *are actively investigating the disappearance of someone from a building in Paris*), (16) Rosemary’s obsession with a photo that she found in that same apartment in Paris (like the PLAINTIFF’s character “Jerri’s” obsession with a photo that she had seen in that same apartment in Paris); (17) a “Paris Police Commissioner” in the FILM who has been documenting disappearances for decades, and whose help Rosemary seeks to help her solve a disappearance (like the PLAINTIFF’s character “Professor Stern”, who has been**